

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PUBLIC INQUIRY ON MODIFICATION OF SERVICE
PERFORMANCE MEASUREMENT PLAN

Docket No. PI2022-3

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-6 OF CHAIRMAN'S INFORMATION REQUEST NO. 1**
(June 3, 2022)

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 1, issued on May 25, 2022.

Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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June 3, 2022

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1. Please quantify the amount of mail volume that would be likely impacted by the proposed revision to the CET applicable to Periodicals, disaggregated by product/category and type of processing, as shown below:
 - a. Periodicals, Flats Sequencing System (FSS) mail processing:
 - i. No Bundle Sort Required, 5-Digit Scheme Container.
 - b. Periodicals, Non-FSS mail processing:
 - i. No Bundle Sort Required, 5-Digit Scheme Container; and
 - ii. Bundle Sort Required, 3-Digit and Up Container.
 - c. Within County Periodicals, any type of mail processing.
 - d. Outside County Periodicals, any type of mail processing.

RESPONSE:

a.

- i. As can be seen below, approximately 44% of this volume is currently entered between 8:00 a.m. and 11:00 a.m. Assuming that none of this volume will shift to meet the new CET, then 44% would be impacted by the proposed revision.

| AET <= 08:00 | | AET BETWEEN 08:00 AND 11:00 | | AET > 11:00 | | Total Measured Volume | |
|-------------------|-----------------|-----------------------------|-----------------|-------------------|-----------------|-----------------------|-----------------|
| % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume |
| 10% | 1,117,291 | 44% | 4,875,198 | 46% | 5,076,529 | 100% | 11,069,018 |

Note: Data used is limited to volume in service performance measurement delivered in the month of April 2022. AET = Actual Entry Time

b.

- i. As can be seen below, approximately 61% of this volume is currently entered between 8:00 a.m. and 2:00 p.m. Assuming that none of this volume will shift to meet the new CET, then 61% would be impacted by the proposed revision.

| AET <= 08:00 | | AET BETWEEN 08:00 AND 14:00 | | AET > 14:00 | | Total Measured Volume | |
|-------------------|-----------------|-----------------------------|-----------------|-------------------|-----------------|-----------------------|-----------------|
| % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume |
| 12% | 2,182,304 | 61% | 11,539,621 | 27% | 5,141,469 | 100% | 18,863,394 |

Note: Data used is limited to volume in service performance measurement delivered in the month of April 2022. AET = Actual Entry Time

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- ii. As can be seen below, approximately 18% of this volume is currently entered between 8:00 a.m. and 11:00 a.m. Assuming that none of this volume will shift to meet the new CET, then 18% would be impacted by the proposed revision.

| AET <= 08:00 | | AET BETWEEN 08:00 AND 11:00 | | AET > 11:00 | | Total Measured Volume | |
|-------------------|-----------------|-----------------------------|-----------------|-------------------|-----------------|-----------------------|-----------------|
| % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume |
| 6% | 126,231 | 18% | 401,752 | 77% | 1,718,902 | 100% | 2,246,885 |

Note: Data used is limited to volume in service performance measurement delivered in the month of April 2022. AET = Actual Entry Time

- c. As can be seen below, approximately 54% of this volume is currently entered between 8:00 a.m. and 2:00 p.m. Assuming that none of this volume will shift to meet the new CET, then 54% would be impacted by the proposed revision.

| AET <= 08:00 | | AET BETWEEN 08:00 AND 14:00 | | AET > 14:00 | | Total Measured Volume | |
|-------------------|-----------------|-----------------------------|-----------------|-------------------|-----------------|-----------------------|-----------------|
| % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume |
| 12% | 149,024 | 54% | 674,707 | 34% | 419,085 | 100% | 1,242,816 |

Note: Data used is limited to volume in service performance measurement delivered in the month of April 2022. AET = Actual Entry Time

- d. As can be seen below, approximately 58% of this volume is currently entered between 8:00 a.m. and 2:00 p.m. Assuming that none of this volume will shift to meet the new CET, then 58% would be impacted by the proposed revision.

| AET <= 08:00 | | AET BETWEEN 08:00 AND 14:00 | | AET > 14:00 | | Total Measured Volume | |
|-------------------|-----------------|-----------------------------|-----------------|-------------------|-----------------|-----------------------|-----------------|
| % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume | % Measured Volume | Measured Volume |
| 13% | 20,502,599 | 58% | 90,079,664 | 28% | 43,585,764 | 100% | 154,168,027 |

Note: Data used is limited to volume in service performance measurement delivered in the month of April 2022. AET = Actual Entry Time

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- 2.** Please identify all geographic areas in the Postal Service network that would be likely impacted by the proposed revision to the CET applicable to Periodicals.

RESPONSE:

Every 3-digit ZIP Code would be likely impacted by the proposed revision to the CET applicable to Periodicals.

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- 3.** Please confirm that the Postal Service conducted a study to estimate the impact of the proposed revision to the applicable CET on the expected days to delivery for the Periodicals mail class.
- a. If confirmed, please discuss in detail whether and how the proposed revision to the CET applicable to Periodicals would impact expected days to delivery for the Periodicals mail class, individual products and other categories identified in question 1. If the disaggregated results are not available, please explain why.
 - b. If not confirmed, please explain why the Postal Service has not conducted such a study.

RESPONSE:

Though no studies were conducted, the Postal Service did assess its ability to meet the operating plan for Periodicals (among other products) while accommodating multiple arrival times, which inhibit adequate staff allocation and create other processing challenges. The current system was found to impede its basic commitment to receive mail by day-zero and provide day-one delivery upon receipt of SCF-entered Periodicals mailings. This change is intended to align the CET for Periodicals with the network-expected arrival time of like-shaped products, and thus to improve efficiency and meet the expected day of delivery for all like-shaped products. On-the-ground operational experience strongly suggests that it will.

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4. Please explain in detail how the expected delivery date for an individual Periodicals mailpiece would be impacted by its arrival at a facility prior to the CET. In your response, please also discuss a similar impact (if any) for a mailpiece arriving at a facility after the CET has passed.

RESPONSE:

As indicated in response to Question 3, the Postal Service expects the simplified CET to improve processing efficiency to a considerable degree by allowing like-shaped pieces to be amalgamated and processed within the same operating timeframe. This should increase the likelihood that *all* Periodicals mailpieces will be delivered on or before their expected delivery dates. Additionally, this would allow Periodicals mailpieces to meet the critical dispatch times to reach urban areas and extended distances to service rural areas.

The CET is the latest time mail can be received at designated induction point in the postal network in order for it to be processed and dispatched in time to meet expected day of delivery. If the Postal Service accepts a mailing before the CET for that day, the day of receipt is designated as the arrival date. If the mailing is accepted after the CET, the mailing will have an arrival day of the following applicable processing day. However, the calculation of expected delivery days remains unchanged and will continue to be calculated as it currently is.

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- 5.** Please explain in detail how the expected delivery date for an individual Periodicals mailpiece would be impacted by its arrival at a facility after the CET has passed. In your response, please also discuss a similar impact (if any) for a mailpiece arriving at a facility after the CET has passed.

RESPONSE:

See the response to Question 4 above.

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6. Please identify the date on which the Postal Service plans to implement the proposed revision to the CET applicable to Periodicals.

RESPONSE:

Subject to the Commission's final order in this Docket, the Postal Service plans to implement the proposed revision after reasonable time for Commission review. The Postal Service notes that it has satisfied the 30-day notice requirement set forth in 39 C.F.R. § 3055.5.